

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DONNA WOOD, CAELAN DOHERTY, MAX GOLDSTEIN, BRIDGET LOGAN, JAMES KYLE NEWMAN, ZIA ORAM, ALAN ROBINSON, ALEXANDRA MARIE WHEATLEY-DIAZ, individually and on behalf all others similarly situated, and CHERYL BALDWIN, JONATHAN BARRIO, DESMOND BATTIS, GARRETT BECKENBAUGH, COCHIESE BOWERS, MILES CEPLLECHA, ROBIN CEPPOS, MELINDA CIRILO, JANE CONRAD, ROBERT CORDOVA, JR., CHRISTINE DOCZY, RACHEL DOUGLAS, THERESA EDWARDS, ELIZA FINK, JASON FINKELSTEIN, ILSE MENDEZ FRAGA, JOSH FREDRICKSON, MARIA GONZALEZ, NATHANIEL ROBERT GROH, BRANDI HARRIS, PETER KAMARA, MACK KENNEDY, MADISON OLIVER MAYS, PATRICK MCHUGH, FRIDA MICHELLE NARANJO, PAUL MONTEROSSO, REY MURPHY, JOSEPH NESTOR, LUKE NICHOLAS, JOSEPHINE OLINGER, ALEC SILVESTER, DANIEL SMITH, CHRIS SOTH, AUDRA TELLEZ, CARLOS TORRES, ELLIOTT TRICOTTI, GLORIA TYLER, LAKISHA WATSON-MOORE, JESSE WEINBERG, CLEM WRIGHT, ANOOSH YARAGHCHIAN, and JESUS ZAMORA, individually,

Plaintiffs,

v.

MIKE BLOOMBERG 2020, INC.,

Defendant.

No. 20 Civ. 2489 (LTS) (GWG)

**NOTICE OF PLAINTIFFS'
UNOPPOSED MOTION FOR
PARTIAL JUDGMENT UNDER
FED. R. CIV. P. 54(b)**

For the reasons set forth in Plaintiffs' accompanying Memorandum of Law, Plaintiffs respectfully request that the Court enter final judgment under Federal Rule of Civil Procedure 54(b) on Plaintiffs' dismissed fraudulent inducement and promissory estoppel claims, and further make an express determination that there is no just reason for delay.

Pursuant to the Court's Individual Practices, Plaintiffs certify that they have used their best efforts to informally resolve this request. Plaintiffs' Counsel conferred with Defendant by letter on April 7, 2022 and participated in a telephone conference on April 19, 2022. Defendant's Counsel represented that Defendant does not oppose the relief requested.

Dated: April 22, 2022
New York, NY

Respectfully submitted,

/s/ Justin M. Swartz

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